



HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel

THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NEW YORK 10007

JOSHUA KAUFMAN  
Assistant Corporation Counsel  
jokaufma@law.nyc.gov  
Phone: (212) 356-3521  
Fax: (212) 356-1148

April 8, 2022

**By ECF**

Honorable Loretta A. Preska  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Dave Alicea v. City of New York, et al.*, 16 Civ. 7347 (LAP)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York and the attorney assigned to represent the defendants in the above-referenced action. In that capacity, I write to respectfully request an extension of time of sixty (60) days from April 11, 2022 to June 10, 2022 to submit the joint pre-trial order currently due on April 11, 2022, for the reasons discussed more fully below. Plaintiff's counsel, Natasa Siveski consents to this request.

The undersigned requests an enlargement of time because the undersigned is still in the process of familiarizing myself with the facts in this case, as well as the voluminous number of exhibits in this case. *See* Docket Entry Numbers 91 and 95. The parties conferred via telephone on April 7, 2022 and plaintiff's counsel consents to this request.

Accordingly, defendants respectfully request that the Court extend the time to file the joint pre-trial order

So ordered. Thank you for your consideration herein.

*Loretta A. Preska*

*4/8/22*

Respectfully submitted,  
Joshua Kaufman  
Joshua Kaufman  
Assistant Corporation Counsel  
Special Federal Litigation Division

CC: All Counsels of Record